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February 17, 2025

Hon. Robert M. Levy
United States Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Marques v. Indian Taj. Inc. d/b/a Santoor Indian Restaurant, Et. Al.
Case No. 1:20-cv-05855-DG-RML
Letter Motion Requesting Adjournment and Appointment of a GAL

Your Honor:

I have recently been retained by the family of Kirpal Singh a named Defendant. The retainer is through his wife Ms. Jugraj Kaur. She informs me that Kirpal Singh is disabled having cerebral infarction and vascular dementia and has multiple health problems having suffered a stroke. Ms. Kaur recently found out about this complaint because she has a joint account with her husband that is now restrained as a result of his default judgment. My client does not have a Power of Attorney nor an adult guardianship for her husband. Ms. Kaur is willing to waive any potential conflict that may arise. But under the circumstances Mr. Kirpal Singh has not retained me and lacks capacity to do so. The Court will want to appoint a GAL under FRCP 17(c) for Mr. Kirpal Singh.

There is currently a motion to dismiss on behalf of Defendant Joginder Singh. And a motion letter from Bhavleen Sabharwal, the attorney for Defendant Harminder Singh requesting an adjourned date of today (2.17.25), to file their motion to dismiss. I am requesting that there be an extension to all deadlines that would serve the judicial economy.

There should be an immediate stay of any levy on the joint account restrained due to Mr. Kirpal Singh's disability, and there would have to be a turnover proceeding as the income in the joint account consists of protected social security income and pension as my client is not the judgment debtor.

Once a GAL is appointed to oversee Mr. Kirpal Singh's interest, I am prepared to file a motion to dismiss for want of proper service and laches, as the long delay in bringing this case has prejudiced against Mr. Kirpal Singh who is not able to personally defend this action.

In Conclusion, we request an immediate stay of any levy and a virtual premotion conference for my appearance and allowing for Ms. Jugraj Kaur's appearance, for the Court to appointment a GAL and an adjournment of the current motions as it may see fit and for any other relief that is appropriate, just, and proper.

Respectfully Submitted,

Manuel Moses

Manuel Moses, Esq.